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7	Solutions		
8			
	UNITED STATES DISTRICT COURT		
9	DISTRICT	OF NEVADA	
10			
11	CHARLENE BYNUM individually, as the wife of RONALD BYNUM and as the	CASE NO. 2:17-cv-2102-APG-VCF	
11	Guardian of the Person and Estate of	Consolidated with:	
<b>12</b>	RONALD BYNUM,		
13	Plaintiff,	CASE NO. 2:18-cv-00354-APG-VCF	
13	Tianitiii,	STIPULATION TO CONTINUE	
<b>14</b>	VS.	DEFENDANTS' OPPOSITIONS TO	
15	CITY OF NORTH LAS VEGAS; JACOB	1) PLAINTIFF'S MOTION FOR RECONSIDERATION OF ORDER ON	
	RAY (P#1886); RODRIGO DELARA	MOTIONS FOR SUMMARY	
16	(P#2417); JOHN E TONRY (P#1684) ;JESSE LEE CESENA (P#2425);	JUDGMENT (#191) AS TO THE LV AND CSS DEFENDANTS LR 59.1	
17	ALEXANDER PEREZ; JEFFREY K.	(DOC. 202)	
	LYTLE; YAPHET MILLER; JOHN	ÀND	
18	LANSING; SCOTT NIELSEN; STEVEN MCKLEIN CITY OF LAS VEGAS;	2) PLAINTIFF'S MOTION FOR RECONSIDERATION OF ORDER ON	
19	MICHELLE FREEDMAN; CITY OF LAS	MOTIONS FOR SUMMARY	
20	VEGAS CORRECTIONAL OFFICERS: ALGIN BROOKS, ANGEL JONES,	JUDGMENT (#191) AS TO NLV	
20	ASHWORTH, CORY PRICE,	DEFENDANTS LR 59.1 (DOC. 203)	
21	DANIELLE STONE, GABRIELLE		
22	ABBOT, JASON JONES, JENNIFER BRADFORD, JOSHUA LOPER, JULIO		
	OLARTE, KÁTHLEEN HENLÉY, L.		
23	HENDERSON, LANDROVE, LEIGH MANN, LORIN SMITH, M. SZOSTEK,		
24	MARCOS PARKER, MICHAEL		
	DARREN, MILETTÉ JONES, OFFICER		
25	CREAGER, OFFICER EDWARDS, OFFICER JERNEE, OFFICER KAHELE,		
26	OFFICER KATZ, OFFICER MANRA,		
25	OFFICER MARKITZ, OFFICER		
27	ROGERS, RAMON BROOKINS, ROBERT MORRIS, S. MARTINEZ,		
28	Sergeant B. GRIFFITH. Sergeant		

1 2 3 4 5	KELLEHER, SERGEANT ALVIN KENON, Sergeant LARRY GRAVES, SCOTT EDWARDS, STEVE CHESNEY, TRAVIS ROZ, WESLEY STONE, SERGEANT DENT, CESAR LANDROVE; CORRECT CARE SOLUTIONS, LLC, a Purported Kansas Defendants.		
6	The parties, by and through their respective counsel of record, hereby stipulate and		
7	request that this Court extend the deadline for Defendants to file their respective		
8	Oppositions to Plaintiff's Motions for Reconsideration (Doc. 202 and Doc 203) in the		
9	above captioned case, up to and including December 15, 2020.		
10	This request for an extension of time is not sought for any improper purpose or		
11	other purpose of delay.		
12	Wherefore, the parties respectfully request that this Court extend the time for		
13	Defendants to file their Oppositions to Plaintiff's Motions for Reconsideration (Doc. 202		
14	and Doc 203), up to and including December 15, 2020.		
15	DATED: November 23, 2020	DATED: November 23, 2020	
16 17	LAW OFFICE OF DAN M. WINDER, P.C.	LEWIS BRISBOIS BISGAARD & SMITH LLP	
18	/s/ Dan M. Winder	/s/ S. Brent Vogel	
19	DAN M. WINDER	S. BRENT VOGEL	
20	Nevada Bar No. 1569 3507 W. Charleston Blvd.	Nevada Bar No. 6858 JOHN M. ORR	
21	Las Vegas, Nevada 89102	Nevada Bar No. 14251	
22	Attorneys for Plaintiffs	6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118	
23		Attorneys for Correct Care Solutions, LLC	
24			
25			
26			

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW **28** 

4815-0183-5218.1

1	DATED: November 23, 2020	DATED: November 23, 2020
2		LEWIS BRISBOIS BISGAARD &
3		SMITH LLP
4		
5	/s/ Brandford R. Jerbic BRADFORD R. JERBIC	<i>\s/ Robert Freeman</i> ROBERT FREEMAN
6	Nevada Bar No. 1056	Nevada Bar No. 3062
7	JOHN A. CURTAS Nevada Bar No. 1841	6385 S. Rainbow Blvd., Suite 600 Las Vegas, Nevada 89118
8	495 S. Main Street, Sixth Floor	Attorneys for City of North Las Vegas,
9	Las Vegas, Nevada 89101 Attorneys for City of Las Vegas	Officers Jacob Ray, Rodrigo Delara, John E. Tonry, Jesse Lee Cesena,
10	and Michele Freeman	Chief Alexander Perez,
11		and Fire Chief Jeffrey K. Lytle
12		
13	IT IS SO ORDERED:	
14	Dated: November 24, 2020	
15	Batoa. 1101011111111111111111111111111111111	
16		ANDREW P. GORDON
17		UNITED STATES DISTRICT JUDGE
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LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW 28

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